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ABSTRACT

Since 1950 when only 6 junior-year-abroad programs were in existence, almost all of the liberal arts colleges in the U.S. have instituted some type of foreign study program for which academic credit may be earned. Because of the vast numbers of students involved in this type of study, it has become evident that there is a need for the regional accrediting agencies to evaluate foreign study programs when evaluating the rest of a college and its other programs. Some of the guidelines suggested for the evaluation of overseas programs are: (1) the program should be consonant with the aims and objectives of the institution: (2) participants should be carefully selected; (3) participants should be adequately prepared and oriented for the experience; (4) adequate counseling and guidance should be available; (5) follow-up studies of individual and institutional benefits should be made; (6) overseas programs should be staffed and directed under the same policies maintained at the home institution; and (7) faculty and staff should have had previous overseas experiences. (HS)

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EVALUATION OF UNDERGRADUATE PROGRAMS

IN WHAT WAY SHOULD EVALUATION OF OVERSEAS STUDY PROGRAMS BE INCLUDED IN THE ACCREDITATION PROCESS FOR COLLEGES AND UNIVERSITIES?

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Dr. Allan O. Pfnister, Professor of Higher Education at the University of Denver, presented this paper at the Annual Membership Conference of the Council on International Educational Exchange, Tarrytown, New York, November 21, 1969. The paper was presented as a working document at the workshop session discussing evaluation and accreditation of undergraduate study abroad programs. Dr. Pfnister, at the request of the Federation of Regional Accrediting Commissions on Higher Education, is currently engaged in a comprehensive study of the role of the regional accrediting organizations.

EVALUATION OF UNDERGRADUATE PROGRAMS

IN WHAT WAY SHOULD EVALUATION OF OVERSEAS STUDY PROGRAMS BE INCLUDED IN THE ACCREDITATION PROCESS FOR COLLEGES AND UNIVERSITIES?

Overview

At the outset may I note that the question posed for this working group implies that the issue is not whether evaluation of overseas programs should be included in the accrediting process, but rather "in what way" evaluation should be included. This formulation may or may not be acceptable to you. For my own part, I should think that some of you would want also to reflect on the prior question: Should evaluation of overseas study programs be included in the accreditation process? At least, I see my role in presenting this paper as including consideration of both the "why" and the "how."

In considering the "why" and the "how", my initial observation is that anyone who undertakes a review, even a cursory review, of the literature describing and discussing the involvement of American colleges and universities in overseas programs soon becomes aware of the incredible variety of activities grouped under the label "overseas programs." These range all the way from the exchange of library materials between the U.S. and foreign institutions to extensive study in more or less permanent study and research centers in foreign countries. And even if we focus upon study programs abroad, we are still faced with an amazing range of activity.

During the spring of 1966 the Institute of International Education and what is now the Council on International Educational Exchange sponsored three conferences on "The Role of Undergraduate Study Abroad in American Education." In summarizing the discussions in the conferences, Ben Euwema observed:

> The first fact which emerged from the conference was the immense variety in the nature of the programs. However uniformitarian American society at large may have become, there is certainly no uniformity in our foreign student programs. Institutions differed radically with respect to almost every detail of operation. It is, therefore, very difficult to make any observation about foreign study without at once noting a host of exceptions. This variety makes for a number of rich offerings and should provide fertile ground for future research, but it renders an orderly exposition somewhat difficult.[1]

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[1]Ben Euwema, Undergraduates Overseas: A Look at U.S. Programs (New York: The Institute of International Education, 1966), p.3.

Colleges sending but one student, or planning to send one or two students overseas and colleges having on campus one foreign student or planning to have on campus one or two students will report maintaining an overseas study program as readily as a university having several well-established centers enrolling a score or more of students in each.

In order that we maintain some focus for our considerations, let me further narrow our attention to those study programs in which American students may gain academic credit applicable to degrees in American colleges and universities. The credit may be applied toward the undergraduate major (this is particularly the case among foreign language majors), to fulfilling general education requirements or to completing electives. Whatever the purpose, it is still assumed by the student that he will receive some credit toward his degree. Even if we employ this kind of distinction, we still are dealing with a large number of programs.

It is not my purpose to try further to describe the range of the programs. I shall simply borrow from Euwema's summary and ask that you accept his descriptions as working definitions. He refers to four kinds of programs. The "Branch Campus Program," is one in which the "American institution buys or leases a building, equips it, ships over a staff, perhaps engages a few faculty members of a nearby foreign university (or secondary school), and teaches some of its regular courses and/or one or two specially designed courses in the foreign setting."[2]

A second type of program is the "Half-Way House." This describes an arrangement somewhere between the branch campus and a completely integrated program. In a Half-Way House Program, the college "creates a situation in which the student lives abroad, is attached to a foreign university, and (at least to some extent) is taught by members of the foreign university faculty."[3] The particular courses he takes are essentially designed by the American college and his credit and grades are determined on the basis of consultation between the foreign professors and the representative from his own institution.

The third type of program is what Euwema calls "Complete Integration." Under this kind of program, the American student "becomes, in almost every sense of the word, a student of the foreign university."[4] Although he does not become a candidate for the foreign degree and does not take the foreign university examinations, in every other respect he is attending courses and completing the study much as the student in the host university would do.

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[2] Ibid., p.6.

[3] Ibid., pp. 6-7.

[4] Ibid., p.7.

The fourth type of program is the "Independent Study Program." This is a program in which the student and his advisor work out "a plan for independent study before going abroad. He and his advisor agree on a study-prospectus, and they scrutinize the results together upon the student's return to the United States."[5]

These labels may not be sufficiently comprehensive in your thinking, but may we agree upon them as a way of focusing our attention upon the kinds of programs, the evaluation of which, according to our topic, should be included in the accreditation process for colleges and universities.

Why Is Accreditation A Concern?

Why does involvement in these kinds of overseas study become a matter of concern in the accrediting process? From the point of view of accreditation in general, many questions may be raised about any involvement of a college or university in any special program as this involvement relates to the purpose of the institution and the impact upon its structure and its financing. But these programs cause more immediate concern whenever it is established that the student receives academic credit for participation in overseas study. The degree of this concern is likely to increase in proportion to the extent to which the study program constitutes a significant component of the overall educational offerings of a given institution.

Let me note that when I use the term "accreditation" in this paper I am referring to general accreditation, the process of evaluation and approval by one of the six regional accrediting agencies. I want to give more attention to the policies and procedures of these agencies later, but may I only say now that regional accrediting is oriented to the evaluation of a college or university as a whole. That is to say, while the process of accreditation calls for attention to all activities of an institution, the focus is upon those activities which seem to affect the institution most significantly and most generally. Components (programs and instructional units) take on significance in terms of the impact they have on, and the implications they have for, the overall educational program. Everything else being equal, a program involving a limited number of students will call for less concern than will a program involving a large number of students -- unless the program has peculiar importance for the overall academic quality of the institution.

Initially then, it would appear that whether or not the evaluation of overseas study programs should be included in the accreditation process depends in large measure upon the level of involvement of particular institutions and within a particular region, whether a significant

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[5] Ibid., p. 7.

number of students is to be found in overseas study. When the problem is stated in these terms, all that remains for me to do is to report the statistics of involvement -- the number of programs and the number of students -- and we should rather quickly be able to decide whether the issue is of sufficient moment to require us to go on to the matter of how the evaluation is to be included in the accreditation process.

The Question of Numbers

There is little doubt that there has been a striking growth in the number of programs established and the number of students included. While there is no need to document this growth in detail, especially before a group of people already involved in fostering the development of international education, it may be instructive rather quickly to review some of the more recent data. Perhaps we can then establish whether the activity has reached sufficient momentum to be of special concern to regional accrediting agencies.

The Institute of International Education published a report on Undergraduate Study Abroad in 1964. A second, revised edition appeared in late 1966. In this second edition, Stephen Freeman observed that there had been an "astonishing growth of undergraduate study abroad in the past decade" and that:

> The great majority of the liberal arts colleges in the United States now organize some sort of study-travel program of their own, or approve the participation of their students in some other program. Until 1950, only a half-dozen junior year abroad programs existed. The number rose to 22 in 1956. Two years ago the first edition of this book reported 103 college-sponsored programs conducted during the academic year 1962-63. In this new edition, we list 208, an increase of about 100 percent in three years. Summer programs for resident study abroad have increased from 63 in 1962 to 97 in 1965. Scores of institutions have indicated that they are seriously considering the inauguration of a program abroad in the next year or two.[6]

While these statistics are impressive, they are only partial. No one really knows how many American students go abroad each year. Our reports are incomplete. The best estimate is probably that given in the annual publication of the Institute of International Education,

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[6]Institute of International Education, Undergraduate Study Abroad: U.S. College-Sponsored Programs (New York: Institute of International Education, 1966), p. 7.

"Open Doors."[7] The 1969 issue reported that there were 25,359 United States students enrolled in regular academic programs in foreign colleges and universities during 1967-68 and that 11,382 students were enrolled in special sessions -- for the most part summer sessions.

Freeman made an estimate of the portion of students abroad in 1963-64 who were enrolled in undergraduate college-sponsored programs. At that time "Open Doors" reported 18,000 students abroad. He estimated that of these, about 7,500 were in undergraduate college-sponsored programs, that the remainder were in graduate programs or involved in a score of commercial and private enterprises. If we were to use the same proportions, it is possible to make a rough estimate that in 1967-68, of the 25,359 overseas students, over 10,000 were in some kind of undergraduate college-sponsored program.

Because the reports returned to the Institute of International Education for "Open Doors" are sometimes incomplete -- not all foreign institutions report each year and the figures reported may not be all-inclusive-- the estimates are likely to be conservative. It was noted that in 1965 well over 100,000 passports were issued to "students." How many such passports represented students in some kind of study program for which degree-credit was received is unknown. But the figures do suggest that much of the data we have underestimates the number of persons in study abroad programs.

In 1957 the newly established Institute of Research on Overseas Programs of Michigan State University undertook a study of international programs of American universities. The report issued in October, 1958, was called "An Inventory and Analysis."[8] It included not only descriptions of programs involving the exchange of persons but references to arrangements for the sending and receiving of "research findings, cultural or educational information, library materials, or equipment." In building the inventory the Institute initially sent questionnaires to 1,945 universities or branches of universities. On the basis of responses to that questionnaire, a second inquiry went to 533 institutions that appeared to have some type of program. Over 90 percent of the persons or institutions contacted replied, and out of this study the Institute identified 382 international programs conducted by 184 institutions. Of the 382 international programs, 157 involved United States students abroad, and these programs enlisted approximately 3,500 students, the majority in undergraduate programs from nine to twelve months. However, 78 of the programs had nine or fewer students,

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[7] Institute of International Education, Open Doors 1969: Report on International Exchange (New York: Institute of International Education, 1969).

[8] Institute of Research on Overseas Programs, The International Programs of American Universities (East Lansing, Mich.: Michigan State University, 1958), 323 pp.

and 16 reported no students at all involved that year. Only 23 of the programs involved 40 or more students.

In 1966 the Institute of Advanced Projects of the East-West Center repeated the study.[9] This time, on the basis of the returns to the initial questionnaire, 1,552 inquiries were sent out to determine more precisely the nature of the international education program. The return was approximately 91 percent.

The data covering 1964-65 showed an increase from 382 different programs to 1,314 different programs and an increase from 184 institutions involved in international programs to 369 institutions. Of the 1,314 different programs, 429 involved United States students studying abroad. This is to be contrasted with the 157 programs for U.S. students abroad in 1957-58. The 1965 study showed further that the 429 programs for U.S. students abroad were sponsored by 264 U.S. institutions. Comparable data on this last item was not included in the 1957-58 study.

In 1964-65, of the 429 programs, 225 enrolled fewer than 10 students. On the other hand, 81 programs enrolled 40 or more students. This last figure is to be compared with the fact that only 23 programs in the previous study involved 40 or more students.

In connection with the preparation of the Statement of Policy on Undergraduate Study Abroad prepared by the Federation of Regional Accrediting Commissions of Higher Education in 1967, a limited review was made to determine the extent of institutional involvement in overseas programs among the member institutions in each of the regions.[10] The report does not pretend to be complete, but it does give further information about the involvement of colleges and universities in overseas programs in 1967. For this study 93 institutions reported academic year study abroad programs; the largest numbers of institutions were in the Middle States Association (28) and in the North Central Association (30).

Reports from the institutions on the number of students involved in each of the programs were incomplete, and yet the total reported was almost 4,000. The largest number of students were enrolled in institutions in the North Central region (1,194). The next largest were from the Western Association (974) followed by the Middle States Association (740). In each instance, the figures represent minimal numbers. A number of the institutions reporting programs did not list the number of students involved.

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[9] Institute of Advanced Projects of the East-West Center, The International Programs of American Universities: An Inventory and Analysis (East Lansing, Mich.: Michigan State University, 1966), 466 pp.

[10] Report prepared by Robert Kirkwood for the Federation of Regional Accrediting Commissions of Higher Education.

The question remains as to whether or not the number of students involved is significant as related to the total enrollment in higher education. The total reported enrollment for the fall of 1968 was in the vicinity of 7.5 million students. This figure includes all students pursuing some kind of degree-credit program, part-time and full-time. Does the more than 25,000 students reported by the Institute of International Education for 1967-68 represent a significant portion of the 7.5 million students? And if by various estimates only half of these are in institutionally sponsored programs, is the involvement large enough to be concerned about? That is to say, should regional accrediting agencies make a special effort to include the evaluation of such programs in the accrediting process?

The increase in the number of programs and in the number of students participating in the programs is viewed by some writers as only the beginning of what must continue to grow. The Institute of Advanced Projects of the East-West Center in its report suggested that "study or research abroad is almost assuming a 'human right' level among academics" and "the number and nature of university international programs reveals more than institutionalization. It is clear these programs are not just 'overseas operations' or 'international dimensions' -- they are becoming normal ingredients of higher education."[11] The predictions are echoed in a score of other reports.

Whether the number of programs and the number of persons in these programs, together with the predictions of continued growth in both, is sufficient to merit special consideration on the part of regional accrediting agencies obviously is something the membership of the regional agencies will have to decide. But it seems to me that although the numbers involved represent only a small portion of the total enrollment in higher educational institutions, they are of sufficient magnitude to merit attention. Certainly in those institutions heavily involved in overseas study programs the implications for the overall educational program need to be examined. And even in cases in which only a limited number of students participate, some attention needs to be given to the extent to which normal procedures in evaluating performance and assigning credit are followed.

Other Considerations

But, quite apart from the number of students from a particular campus involved, are there not some other considerations that weigh upon this issue of evaluation and the accrediting process. What of the possible impact of overseas study programs on the host institutions? Stephen Freeman observes in Undergraduate Study Abroad:

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[11] Institute of Advanced Projects, East-West Center, op.cit., p. 21.

> We cannot allow an American student to wander blindly into a foreign educational system and discredit our own by his apparent awkwardness and stupidity. Expert information and wise counsel must be ready to prevent him from wasting a precious year. Many colleges have not yet awakened to the existence of the problem and the need.[12]

There is already increasingly expressed concern on the part of overseas institutions about the influx of American students. The concern is not only because the number of American students has become significant and accentuates the already crowded conditions of many foreign institutions; it is also a matter of the quality of the American programs and how they are to be related to the host or affiliated institutions.

In some respects the current situation is an echo of that of the early 1900's. During that period a considerable number of students from the United States were seeking post-baccalaureate study in European universities. Questions arose about the effectiveness of the American colleges in preparing students for university study in Europe. The University of Berlin in 1904 took the position that only students holding baccalaureates from institutions maintaining membership in the Association of American Universities would be admitted to graduate study. Other German universities adopted the same policy. These actions in effect led the Association of American Universities into a form of accrediting. The Association had been founded in 1900 with an initial membership of fourteen institutions offering advanced or graduate instruction. The purpose of the Association was to encourage joint consideration of matters relating to graduate study. The Association tried to prevail upon the U.S. Bureau of Education to prepare some kind of classified list for the European universities, but the AAU itself provided such a listing until 1948.

I am not suggesting that the pressures of the early 1900's are developing in the same way today, but I am suggesting that overseas institutions find themselves at a disadvantage in attempting to assess American overseas programs and in determining the level of affiliation they are able to maintain with American programs. There is presently no way to assure the maintenance of quality in the American programs or to assure that the relationships between the American institutions and the foreign institutions are appropriately maintained. As American programs continue to multiply it is not inconceivable that there will come from some foreign institutions stronger requests for some type of certification and/or control. If I am not mistaken, the concern has already been expressed by institutions in the Netherlands and in Spain.

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[12] Institute of International Education, Undergraduate Study Abroad, op.cit., p.31.

The issues arise in another way. How are programs jointly operated by American and overseas institutions to be judged? At the present time there are relatively few such programs, but two years ago at the Third Conference on American Academic Programs in Europe sponsored by the CIEE, the suggestion was made that more effort be directed to joint American-European university programs.[13] Recently, one of the regional accrediting agencies agreed to an overseas on-site examination of the program of one of its member institutions with an overseas institution. American teacher-certifying agencies and American employing agencies questioned the nature of the program. It seemed important that some kind of evaluation be made of the offerings. As of now, the program has preliminary accreditation, but the issues are not entirely clear and next steps and procedures still need to be worked out.

In still another way the issue arises. Recently, a group of European study program directors constituted themselves as a kind of accrediting agency to review programs in their region and to determine which of the programs should be recognized in some official way. Concerned about the quality of some of the programs being established, they decided to form a membership group to certify that at least minimal criteria were met in the setting up of an overseas study program in their region. They intend to provide information regarding American programs in Spain "to any academic or cultural organization requesting such information.... to provide advice and counsel on the desires and needs of the American programs as well as the preservation of good relations between Spanish institutions and American programs."[14] The conference states that in order to maintain the academic worth and validity of overseas study programs in Spain, "we need evaluation, and the evaluation should lead to some form of regional accreditation."[15]

Currently, between 18 and 20 American-sponsored programs are related in some manner to the University of Madrid. It is unlikely that additional programs can be accommodated, although additional American colleges apparently wish to initiate programs in Madrid. The directors of existing programs are concerned about the quality of some of the proposed programs. The University of Madrid officials are seeking some guidance

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[13] Cf. Frederico Perez Castro, "New Directions in Academic Exchange," The Developing Relationship Between Sending Institutions and Receiving Institutions: Their Problems, Significance and Potentials, Occasional Papers issued by the Council on International Educational Exchange, No.12 (New York: Council on International Educational Exchange, 1967), p. 3.

[14] Regional Conference of American Programs in Spain, Organizational Plan. Letter addressed to several international education agencies in the United States April 30, 1969.

[15] Ibid.

in determining which programs to accept and on what basis. The Regional Conference of American Programs in Spain, in the absence of some other form of evaluation procedures is seeking to provide its own form of accreditation. Elsewhere, it appears that the directors of American overseas programs in Germany are expressing the same concern for some form of evaluation. Will directors of programs in other regions seek to organize as well?

Consider another variation of the issue. In 1965 the National Council of State Supervisors of Foreign Languages appointed a study committee to review the status of study and travel abroad offered to high school students. It found enough in the review to raise questions about the nature of the programs being offered and as a result approved at the annual meeting in December, 1966, "Criteria for Evaluating Foreign Study Programs for High Schools." The criteria make reference to sponsorship, recruitment and selection of students, selection of the group leader, the nature of the study, the nature of living conditions, and the financial arrangements. The report concludes with the words "Caveat Emptor." The Council well recognized that with the expansion of such programs, the number of programs of questionable quality would inevitably increase. It thought to provide some guidance for persons who were concerned about the quality of the program with which they might become involved.[16]

Add another complication. The number of agencies involved in sponsoring overseas study continues to multiply. Whereas many of the earlier programs were sponsored by educational institutions, individual institutions or groups of institutions, in recent years there has been a singular increase in the number of independent agencies involved. A large number of private commercial and semi-commercial organizations are at least advertising the opportunity for overseas study. They are also indicating that college credit is available. This raises the question of the relationship between the home institution of the students and the commercial agencies. And while questions may be raised about the quality of programs operated by educational institutions, it is even more difficult to define the quality of programs not directly under institutional control.

The problem has become sufficiently acute to cause the Bureau of Educational and Cultural Affairs of the U.S. Department of State to issue a pamphlet, "A Word of Caution," regarding private work, study and travel abroad organizations. The Department reports that it has received a number of complaints from participants ranging all the way from persons finding themselves "stranded in a foreign country; forced to work under conditions far different from those advertised; taking courses with little or no academic credit; or paying fees far exceeding the value of services received -- because of inadequate educational

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[16]Criteria for Evaluating Foreign Study Programs for High School Students," Foreign Language Annals, I (May, 1968), pp. 288-290.

planning or administration, or because services were essentially those the travel agency would perform."[17] The Bureau recognizes that the complaints may be directed against a relatively small number of organizations but nevertheless feels that a word of caution is needed. It suggests a series of questions which may be raised regarding the nature of the organization, the fees charged, the circumstances under which refunds are possible, the location of the office, the purpose of the organization sponsoring the program, the extent to which orientation is provided, the advantages advertised, and the way in which the program is presented.

Perhaps the extent of concern about the quality of overseas programs is best expressed in another statement of Stephen Freeman in Undergraduate Study Abroad. Referring to the wide range and the quality of overseas programs, he notes:

> Both urgent and practical is the plea from high school and college teachers under pressure to advise their students, and from the parents and from the students themselves: "How can we distinguish a good plan from one less good or from one which is down right bad? Is there no official evaluation or accredited list which can guide us?"[18]

Freeman faces up directly to the problems that would be involved in accreditation of overseas programs as such, and seriously questions whether any organization should attempt an official evaluation or accreditation of the scores of programs underway. But he does indicate that some measure of quality needs to be established. He makes some proposals regarding questions to be asked in making such an evaluation.

It was out of the same concern that the Council on International Educational Exchange, as the Council on Student Travel, published first in 1965 A Guide To Institutional Self-Study and Evaluation of Educational Programs Abroad. The Guide was developed because of the concern for the quality of educational exchange programs, the rapid growth of these programs, and the need for some sort of guidance both to the institution establishing such programs and to the person who wanted to make his own judgment about the quality of the programs.

Perhaps by this time we have at least established that there is a large measure of concern about the nature and quality of overseas programs. The increase in the number of programs and the number of students involved, the concern of the overseas institutions, the development of joint programs, the initiation of accrediting procedures by independent groups, the increase in the number of agencies

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[17]"Students, Teachers, Counselors--A Word of Caution: Private Work, Study or Travel Abroad Organizations," (Washington, D.C.: Bureau of Educational and Cultural Affairs, Department of State, n.d.).

[18]Institute of International Education, Undergraduate Study Abroad, op. cit., p. 10.

promoting overseas study, the appeals of parents and students, all point to the need for some clearer standards for the development and maintenance of overseas study programs.

If regional accrediting agencies were to become involved in the evaluation of these programs in some special way, what would be the nature of their involvement?

The Regional Accrediting Agencies

In considering the way in which regional accrediting agencies might include in some special way attention to overseas study programs, we should be aware of how general accreditation is carried on in the United States. And the most distinctive characteristic of general accreditation is that it is voluntary in nature. By that it is meant that under our present accrediting procedures, no institution need by law become affiliated with a regional accrediting agency.

Virtually every writer on the subject of accreditation in the United States is quick to point out that the American system--or lack of system-- is unique. In contrast with most other countries, particularly with European countries, the United States has no central agency such as a ministry of education exercising direct control over universities and other agencies of education. In the United States education is a function of the state or of private agencies operating under the laws of the state, and both public and private institutions have in the course of their histories possessed a high degree of autonomy.

> The principle of state and local control of education is older than the nation itself. Provision for local control of schools was embodied in the earliest public school legislation of the Colonies, and the principle was continued in the later school legislation of the states.[19]

And thus it was that each state, in accordance with its own constitution, has determined the pattern of tax-supported education within its confines and has established provisions for chartering and regulating the organization of private institutions. It is within that structure that accrediting has also taken on the characteristics of local determination.

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[19]Jennings B. Sanders, "The United States Office of Education and Accreditation," Accreditation in Higher Education (Washington, D.C.: U.S. Office of Education, 1959), p. 15.

> Historically, this country was developed and has thrived in the past on the philosophy of laissez-faire. The forests were felled, the land cultivated, the mineral resources explored, and business and industrial enterprises created through individual initiative seldom restricted until near the end of the past century by governmental regulations and legal controls. It was only after frequent abuses of the public welfare became widespread that the United States Congress officially recognized the situation and adopted legislation providing for some governmental regulations.[20]

Higher education has in a sense paralleled the economic and industrial development of the country, and it was only when problems and issues in higher education led to some concern with abuses that a type of regulation and standardization emerged. But within higher education, the agencies for regulation and standardization have been organized on a non-federal and for the most part a non-governmental basis.

There was a short period of time when it appeared that there might have been developed a national approach to accrediting. This move represented the convergence of several forces in the early 1900's. The United States Bureau of Education had been established as the United States Department of Education in 1867. The regional accrediting agencies developed in the late 1800's. Although not at first involved in accrediting as such, the New England Association of Colleges and Secondary Schools was established in 1885 as the New England Association of Colleges and Preparatory Schools. The New England Association was followed by what is now the Middle States Association in 1887, the North Central Association in 1895, and the Southern Association in 1895. (The two remaining regional associations were not established until the 1900's: the Northwest Association in 1917 and the Western College Association in 1924.) The growing influence of these regional associations, affected in part the question of whether or not there should be some kind of national evaluation.

A second force was the demand of the University of Berlin in 1904 that only students holding baccalaureate degrees from institutions with membership in the Association of American Colleges would be admitted to graduate study. Reference has already been made to this development.

The third force was the concern of the Commissioners of Education. Beginning with the first Commissioner, Henry Barnard, the United States Department of Education in published reports on education included considerable evaluative material on American colleges and universities. Barnard indicated that he intended to provide information of this sort

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[20]William K. Selden, "Nationwide Standards and Accreditation," Emerging Patterns in American Higher Education (Washington, D.C.: American Council on Education, 1965), p. 212.

in his reports and "in the absence of formal standardizing or accrediting of collegiate institutions by public or private institutions, the information assembled and published by Barnard and his successors offered the only basis for comparing on a nationwide scale the numerous higher educational institutions."[21] Commissioner Elmer Ellsworth Brown (1906-11) in his report for 1908 referred to the necessity of some kind of "standardizing" of American higher education.

In 1911, with an appropriation from the previous year for the appointment of a specialist in higher education, the Bureau of Education established a Division of Higher Education. The first specialist, Dr. Kendric C. Babcock, with the assistance of the Association of American Universities, compiled a classified list of colleges. The colleges were grouped according to four classifications, depending upon the records of their graduates made in advanced study. The galley proof of the list came to the attention of the public press, opposition developed against the way in which certain institutions were classified, and President Taft directed the Commissioner of Education to withhold publication. The following year, with the inauguration of President Wilson, the Association of American Universities asked that the list be published, but it was not released at that time.

The subsequent work of the Office of Education has been in the way of reporting data, providing directories, making studies, but in no ways becoming involved directly in accrediting. The Office of Education did in 1940 issue a bulletin growing out of a national study of accreditation, entitled "Collegiate Accreditation by Agencies Within the States." But the Office of Education as such has not been involved in accreditation.

> The Office of Education is an advisory, consultative, and research office for all levels of education, and its divisions contain professional staff in elementary, secondary, higher, international, and vocational education. That it is not a rating, standardizing, or prescriptive agency for education at any level is not well understood, however, and requests frequently are made of it for evaluation of colleges or programs, or for lists of the best five or the best ten institutions offering work in a given field of learning. . .it should be clearly understood at this point that the Office of Education does not accredit schools and colleges nor does it seek authority to do so. Furthermore, there is obviously no reason why it should perform this function,[22] which is now performed by state and voluntary agencies.

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[21] Jennings B. Sanders, op. cit., p. 15.

[22] Ibid., p. 21.

The nearest the Office of Education has come to accrediting in recent years has been in the establishment of a new office relating to the approval of accrediting agencies and to the certification of colleges, universities, and vocational schools as eligible to participate in federal education programs. The new office serves the entire Office of Education and some of the other federal agencies which are involved in higher or vocational education. The staff consists of an Accreditation Policy Unit and two Institutional Eligibility Units, one for higher education and one for vocational education. The function of the Eligibility Units is to determine the eligibility of individual colleges, universities, and vocational and technical schools for federal construction aid, student assistance, etc. The office also works closely with the existing accrediting agencies and certifies their authority to serve as certifying agencies for federal programs.

Thus it may be said that accreditation in the United States is essentially a voluntary process. That is to say, strictly speaking there is no law that maintains that an institution must be accredited. Each institution decides whether or not it will apply for membership in a particular agency. The policies, procedures, and decisions of each agency are effectively the decisions of that agency alone. And that agency answers only to its own membership.

In a broader sense, of course, every accrediting agency answers to all of society in that it certifies that member institutions have reached a certain level of quality. And the extent to which the seeking of accreditation is actually voluntary is, of course, an open question. Certification of teachers in most of the states requires that a person be graduated from an "accredited" institution or from an "accredited" program. The agency for the accreditation of teacher education is the National Council on the Accreditation of Teacher Education. NCATE will not normally inspect an institution that has not been accredited by the regional accrediting agency. All of which means that the institution need not apply for membership in either of the agencies but that if it does not hold membership in either or both of the agencies it may have some difficulty in placing its graduates. And, in the same way, the federal government agrees to provide loans and grants only to "accredited" institutions or those institutions "actively engaged in preparing for accreditation." Employment may be related to graduation from an accredited institution.

In spite of debates about the degree to which accrediting is voluntary, it seems that accreditation by "voluntary" agencies has become a part of the American scene and that it is unlikely in the foreseeable future that new structures will be developed. There will be some form of consolidation and coordination, but unless something unforeseen occurs, it is unlikely that we shall move from the present voluntary structure to a more closely knit national structure.

The establishment of a National Commission on Accrediting in 1949 has provided some degree of coordination, but this Commission still works with the existing accrediting agencies and in effect is a certifying

agency for those general and specialized groups. It has been effective in eliminating some of the duplication represented by accrediting agencies, has managed to discourage the development of some new agencies, and has had an influence on the review of accrediting procedures.

In 1964 a Federation of Regional Accrediting Commissions of Higher Education was established. This is an organization of the Higher Education Commissions of the six associations. It grew out of a series of informal conferences of Executive Secretaries of the regional associations. Since its establishment it has adopted a number of general statements on the nature and function of accreditation, including a statement on undergraduate study abroad programs and the accreditation of United States institutions outside of the United States.

Accrediting Procedures and the Evaluation of Overseas Study Programs

In what way should the evaluation of overseas study programs be included in the accreditation process for colleges and universities? Have the regional associations up to this time responded in any direct way to the development of overseas study programs? Two statements of the Federation of Regional Accrediting Commissions of Higher Education may be of interest. In 1966 FRACHE adopted a "Policy Statement on Code of Good Practice in Accrediting in Higher Education." This Statement provides the guidelines for any organization involved in accrediting in higher education. In March, 1967, the Federation adopted a "Policy Statement on Undergraduate Study Abroad Programs." This Statement speaks more directly to the evaluation of undergraduate study abroad programs.

'The Code of Good Practice' calls attention to the general stance that an accrediting agency should take toward any type of evaluation. In accordance with the Code, an accrediting agency agrees that it will evaluate or visit an institution only on the invitation of the chief administrative officer; that it recognizes the right of the institution to be evaluated in the light of its stated purposes; that it respects institutional freedom; that it reviews the program or programs of study in the light of the institution's overall goals; that it seeks to assist and stimulate improvement of educational effectiveness; encourages sound educational experimentation and permits innovation; that it regards the evaluation reports as a confidential matter between the institution and the accrediting agency; and that it provides a means of appeal or reconsideration after an accrediting decision. There are many other points included in the Code, but the above will provide some sense of the orientation encouraged by the Federation. The emphasis upon the voluntary aspect of accreditation emerges quite clearly.

'The Statement on Undergraduate Study Abroad Programs' was developed in response to some expressions of concern about the quality of programs underway. The Statement has become part of the policy and procedures

of each of the regional associations. It is included in the series of policy statements issued by the Middle States Association and is referred to by the other associations. In addition, the Senior College Commission of the Western Association has included in its "Guide for the Evaluation of Colleges and Universities," special reference to travel abroad and to foreign study centers. The Southern Association refers to study centers abroad under the general classification of "Special Activities."

The policy statement of the Federation begins with the general statement that:

> Study abroad is increasingly accepted as an important phase of many undergraduate programs in American colleges and universities. Carefully planned and administered, opportunities for foreign study can add significant dimensions to a student's educational experience. At the same time, the great diversity of programs poses serious problems for evaluation and control.[23]

The Statement then suggest ten guidelines for institutions to use in examining their own progrmas and for evaluators to consider in connection with general institutional evaluation. The Statement concludes with a word encouraging American colleges and universities to develop cooperative arrangements among themselves and takes note that commercially sponsored study-travel programs should not normally be considered for degree - credit purposes. The specific guidelines are as follows:

1. be clearly relevant to the purpose and objectives of the sponsoring or participating institutions;

2. be designed to provide educational experiences integrally related to the institution's undergraduate curriculum but otherwise unavailable;

3. be limited to carefully selected students;

4. have rigidly specified language proficiency requirements when appropriate to the program and place of study;

5. include extensive preliminary orientation for intended participants;

6. so far as conditions permit, be staffed and directed under the same policies as the home institution--continuity of administrative direction is especially important;

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[23]Federation of Regional Accrediting Commissions of Higher Education; "Policy Statement on Undergraduate Study Abroad Programs," adopted March,1967. (One of a series of statements issued by the Federation of Regional Accrediting Commissions of Higher Education.)

7. provide counselling and supervisory services at the foreign center equal to those on the home campus, with special attention to problems peculiar to the location and nature of the program;

8. include clearly defined criteria and policies for judging performance and assigning credit in accordance with prevailing standards and practices at the home institution;

9. stipulate that students will ordinarily not receive credit for foreign study undertaken without prior planning or approval;

10. include provisions for regular follow-up studies on the individual and institutional benefits derived from such programs.

Up to this time, the regional associations appear to have had only limited involvement in the direct evaluation of overseas study programs. The policy statement of the Federation allows an examining committee to make its own decision about whether and to what extent the statement is to be applied to a given institution. That is to say, the examining committee has the option of determining whether the institution is sufficiently involved in overseas study to give special attention to that aspect of its program.

The regional associations have not had extensive experience in on-site reviews of study centers. The Middle States Association is currently involved in the evaluation of a candidate institution in Paris. The North Central Association has given preliminary status to a program jointly operated by one of its member institutions and an institute in Paris. The Southern Association has evaluated two institutions in Mexico.

The Commission on Secondary Schools of the North Central Association has had extensive experience in evaluating dependent schools in Europe and elsewhere. These are schools established by the Armed Services for the education of dependents of American personnel stationed overseas. The criteria applied to the dependent schools are essentially those employed in the evaluation of stateside secondary schools. The Secondary Commission of the Southern Association has evaluated American schools in Latin America.

On the basis of written responses to questions about devoting special attention to the evaluation of overseas study programs and on the basis of personal conversations with regional executives, I can report something of the present orientation of these associations. In general, because of what seems to be a limited number of institutions in each of the regions with extensive overseas programs, four of the regional associations presently report only limited involvement. As one executive

stated, "Inasmuch as very few. . .institutions of higher education have their own overseas centers. . .our Commission has not developed or considered for future development special statements or policies on overseas programs." He goes on to indicate that it is opinion, under the present circumstances, the Commission would "simply consider any overseas program, whether based on an institution's own facilities or those of a cooperating institution, as another part of any regular evaluation or re-evaluation of a member institution's educational program." Another executive states that no special effort has been made to gather information on overseas programs. Such information as the Commission has is derived from the data included in the regular institutional self-studies. He observes, "While we attempt to keep abreast of undergraduate programs abroad, we have not singled this area out for special attention. Overseas programs by our. . .institutions involve so few students that it would not warrant us to give special or paramount attention to this area."

Two of the associations, however, are more deeply involved in evaluation of overseas study programs. One association calls attention to the fact that it is the established policy of the Higher Commission "to visit overseas instructional centers maintained by our member institutions, during the course of our periodic re-evaluation of each member institution." He states that the examination of an institution includes visits to established centers as branch campuses maintained outside the United States. However, no attempt is made to visit "incidental programs attended by American students at foreign universities, unless the. . .member institution's involvement is permanent and substantial."

Another association executive emphasizes that while at this time no special statement has been developed apart from the adoption of the Federation's statement, the problem of on-site evaluation of overseas programs appears to be developing into a matter of considerable interest in his association. He states that for "a small and limited program" evaluation on the basis of self-study statements would probably be adequate, but he is of the opinion that when "the overseas campus is more or less permanent and operationally separate, much more in the way of policy, on-site visits, etc., will be necessary."

In summary, for most of the regional associations it does not appear at this time that special procedures are to be developed for the evaluation of overseas study programs. The programs will be examined in the course of normal review of an institntion's accredited status. The extent to which attention is given to the program will depend upon the degree of involvement of the institutions.

The Future

What of future? It is my guess that in the same way that off-campus centers have become matters of concern to certain of the regional associations, so will the increased visibility of overseas programs cause special concern —

as is already the case in two of the regional associations. As the programs develop and as more students are involved, the associations will probably ask more questions about the nature of staffing and supervision and will become concerned about the adequacy of financing and the extent to which the financing of the overseas program has an impact upon the overall financial health of the home institution. But the degree of involvement of the accrediting association in the evaluation of overseas study programs will probably depend, as I have already noted, upon the scope of the program and upon the member institution's own evaluation of the impact of the program on its overall educational functions.

As more attention in the accrediting process is given to overseas study programs, will new evaluation procedures be developed? The basic point of departure in the regional accreditation process is that an institution is to be evaluated in terms of its overall purposes and objectives. The first step in the preparation for accreditation is, accordingly, that an institution clearly define its objectives and show how its activities are directly related to the accomplishment of these objectives and how resources are appropriately directed to the achievement of the objectives.

In the rest of the process, while there are some variations in the specific procedures employed by each of the regional associations, the general pattern is much the same. An institution applying for accreditation is asked to complete a comprehensive self-study and to submit a well-written narrative of the results of the study. Schedules of various types are provided as a guide to the completion of the study, but the institution is encouraged to present its own case as effectively as possible. The self-study requirement is included as an initial step in the accrediting process, because it is believed that involvement in such a study is an important educational experience for the institution and increases its sensitivity to both its problems and potentials.

Following the completion of the self-study and the submission of a report to the Commission offices, the next step is to have a team of evaluators or examiners representing the Commission visit the campus and make an on-the-spot review of the institution's program. The site visit serves to supplement and verify the data secured from the schedules and to allow knowledgeable people to form direct impressions of the quality of the educational program.

Subsequent to the visit, a report of the examining team is submitted to the central office of the accrediting agency, and this report, together with the previously submitted institutional data, is reviewed by the association, either through small committees, an executive committee or executive board, or some other designated group. The recommendation of the committee is then considered by a representative body of the membership designated as the Commission.

While the particular aspects of the program examined during the process will vary somewhat from association to association, the areas of study generally include such items as the definition of overall educational objectives, a description of the organization of the curriculum, the preparation of the faculty, the quality of the instructional program, the nature of the student body, the level of student achievement, the type of student personnel services provided, the organization and administration of the institution, its financing, its library facilities, and the degree to which the institution maintains a continuing evaluation program of its own. Decisions on the accredited status of the institution are based upon weighing the accomplishments in one area as over and against the accomplishments in other areas. There is some difference in philosophy among the regional associations as to whether or not strengths in one area are able to balance out weaknesses in other areas and whether or not an institution should be evaluated in terms of its own potential rather than in terms of some set of minimal standards.

If one relates this overall accrediting approach to the guidelines on the evaluation of overseas study developed by the Federation, it is clear that the guidelines emphasize that overseas study experience is to be integrally related to the institution's educational program and that the overseas experience should not be considered as an adjunct but that it should reflect the basic purposes of the institution.

The criteria included in the Federation's statement may be compared to the criteria included in the CIEE Guide to Institutional Self-Study and Evaluation of Educational Programs Abroad.

In both documents, references are made to the fact that the educational aims and objectives of the overseas programs should be consonant with the aims and objectives of the institution. Both emphasize a careful selection of participants. Both draw attention to the need for preparation and orientation of the participants. Adequate counseling and guidance is a concern expressed in both statements. The CIEE statement makes reference to cross-cultural encounter, while this matter is not specifically mentioned in the Federation statement.

Both statements call for evaluation of the overseas study program. The Federation calls attention to the need for follow-up studies of individual and institutional benefits derived from the program. Both statements refer to the quality of staffing. The Federation document emphasizes that overseas programs should be staffed and directed under the same policies maintained at the home institution. The CIEE document further emphasizes that faculty and staff in overseas study centers should have had previous overseas experience. The CIEE document calls attention to the kind of facilities provided, while the Federation document makes no reference to this matter. CIEE raises questions about the nature of the curriculum, and the Federation document simply states that adequate planning must be provided if academic credit is to be awarded for the overseas study experience. Both documents make reference to criteria for judging performance and awarding credit. CIEE

refers specifically to finances and administration, while these matters are subsumed under the general procedures of the regional accrediting agency.

Conclusion

By a long and devious route, I have tried to sketch something of the nature of accrediting among American colleges and universities, something of the extent of involvement in overseas study programs, something of the concerns of various groups about the quality of these programs. I have also tried to indicate the extent to which regional accrediting agencies have already given some attention to the evaluation of overseas study programs as a component of the educational program of member institutions. Whether the involvement is of the kind and degree members of this study group will consider adequate, is something which you must now determine.

As you continue your examination of the issue, keep in mind that each regional association is just that, an association -- an association of colleges. In the final analysis, the policies of each association are determined by the member institutions. This is both a weakness and a strength; a sufficient number of the member institutions must become concerned if policy is to be changed -- this may be a weakness, but concerned member institutions do influence policy -- and this is a strength. Regional associations have been responsive to changing conditions in higher education, and on the balance must be seen as agencies for both the maintenance and advancement of institutional quality.

The emergence of the Federation of Regional Accrediting Commissions on Higher Education marks an important step in the development of regional accrediting. The Federation has already published a statement on study abroad. This action indicates at least the beginning of a recognition of the impact of study abroad on the educational program of member institutions.